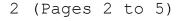
EXHIBIT 3

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IN THE UNITED STATES DISTRICT COURT
          FOR THE WESTERN DISTRICT OF TEXAS
                 SAN ANTONIO DIVISION
LA UNION DEL PUEBLO
                           Ş
ENTERO, et al.,
                           S
                           S
     Plaintiffs,
                           S
                           Ş
                           $ CASE NO. 5:21-cv-844-XR
VS.
GREGORY W. ABBOTT, et
                           S
                           Ş
al.,
     Defendants.
OCA-GREATER HOUSTON, et
                           Ş
al.,
                           S
                           S
     Plaintiffs,
                           § CASE NO.1:21-cv-780-XR
VS.
                           S
JOHN SCOTT, et al.,
                           S
     Defendants.
HOUSTON JUSTICE, et al.,
                           Ş
                           Ş
     Plaintiffs,
                           § CASE NO.5:21-cv-848-XR
VS.
GREGORY WAYNE ABBOTT, et
                           S
al.,
                           S
     Defendants.
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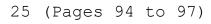


Page 2 Page 3 LULAC TEXAS, et al., ORAL VIDEOTAPED DEPOSITION OF THE CORPORATE REPRESENTATIVE OF MI FAMILIA VOTA, MS. ANGELICA RAZO, Plaintiffs. produced as a witness at the instance of the § CASE NO. 1:21-cv-0786-XR Defendants and duly sworn, was taken in the JOHN SCOTT, et al., above-styled and numbered cause on the 5th day of Defendants. April, 2022, from 9:52 a.m. to 7:05 p.m., before Michelle Hartman, Certified Shorthand Reporter in and MI FAMILIA VOTA, et al., § for the State of Texas and Registered Professional Reporter, reported by computerized stenotype machine **Plaintiffs** § at the offices of Reed Smith LLP, 811 Main Street, § CASE NO. 5:21-cv-0920-XR Suite 1700, Houston, Texas 77002, pursuant to the GREG ABBOTŤ, et al., § Federal Rules of Civil Procedure and the provisions Defendants. stated on the record or attached hereto. UNITED STATES OF AMERICA, § Plaintiff. § CASE NO. 5:21-cv-1085-XR THE STATE OF TEXAS, ET § § Defendants. ORAL VIDEOTAPED DEPOSITION CORPORATE REPRESENTATIVE OF MI FAMILIA VOTA MS. ANGELICA RAZO April 5, 2022 Page 4 Page 5 APPEARANCES 1 APPEARANCES (Cont.) FOR THE PLAINTIFFS MI FAMILIA VOTA, et al.: 2 FOR THE U.S. DEPARTMENT OF JUSTICE: Mr. Bradley Prowant Ms. Wendy Olson (via Zoom) 3 Mr. Michael E. Stewart (via Zoom) and Mr. Elijah Watkins (via Zoom) U.S. Department of Justice STOEL RIVES LLP 4 33 South Sixth Street JENNER & BLOCK LLP 5 Suite 4200 1099 New York Avenue NW Minneapolis, Minnesota 55402 Telephone: 612-373-8860 E-mail: bradley.prowant@stoel.com 6 5 Washington, D.C. 20001 Telephone: 202-639-6000 FOR THE STATE DEFENDANTS: 8 6 Mr. Eric A. Hudson 7 ALSO PRESENT: OFFICE OF THE ATTORNEY GENERAL 10 P.O. Box 12548 (MC-009) 8 Mr. Terry Harrison, videographer Austin, Texas 78711 9 Ms. Amy Frieder, US DOJ (Zoom) 11 Telephone: 512-463-2100 10 Mr. Camryn Pak, US DOJ (Zoom) E-mail: eric.hudson@oag.texas.gov 12 11 Ms. Courtney Hostetler, Free Speech For The FOR THE HAUL PLAINTIFFS: People (Zoom) 13 Mr. Kenneth E. Broughton (via Zoom) 12 and Ms. Sarah Stewart (Zoom) REED SMITH LLP 14 13 811 Main Street 15 14 Suite 1700 15 Houston, Texas 77002 Telephone: 713-469-3819 16 16 E-mail: kbroughton@reedsmith.com
FOR THE DEFENDANT HIDALGO COUNTY DISTRICT ATTORNEY 17 18 18 RICARDO RODRIGUEZ, JR.: 19 19 Ms. Jacqueline Villarreal (via Zoom) 20 20 and Mr. V.M. Garza 21 HIDALGO COUNTY DISTRICT ATTORNEY'S OFFICE 21 100 E Cano St 22 Edinburg, Texas 78539 23 22 Telephone: 956-292-7609 24 23 25 25





	Page 94		Page 95
1	Rocha are filling in Ms. Hidalgo about what's going	1	Q. What other organizations are part of
2	on?	2	this community council?
3	A. I do not know.	3	A. The community council is not formed
4	Q. What is the elections advisory council	4	yet. There's just discussions to form one.
5	supposed to do?	5	Q. What organizations are a part of
6	A. To serve as a community member based	6	Houston in Action?
7	advisory council that can support the	7	A. There's several organizations. More
8	administration's office, making sure that they are	8	than I can list.
9	providing increased access to equitable access to	9	Q. Tell me the ones you can list.
10	the ballot box during elections days.	10	A. Pertaining to the election advisory
11	Q. What does that mean?	11	council or Houston in Action in general?
12	A. That means if any issues arise, that	12	Q. Well, let's talk about Houston in
13	there is an advisory council that can provide	13	Action first.
14	feedback to any election plans before they are to	14	A. Mi Familial Vota's part of it. Other
15	any election plans before they are sent to approval	15	civic engagement organizations, such as OCA Greater
16	by Harris County Commissioners Court and then after	16	Houston, NALEO, which is the National Association of
17	election, do a debrief.	17	Latino Elected Officials, Baker Ripley, Jolt Texas,
18	Q. So	18	League of Women Voters, Engage Texas, East Houston
19	A. The bylaws are being written out as we	19	Empowerment Center, maybe I forgot the name.
20	speak.	20	That's all I recall at the moment.
21	(Court reporter asks for clarification).	21	Q. And which of these are involved in the
22	Q. (BY MR. HUDSON) Are you saying written	22	elections council advisory?
23	out or written now?	23	A. Did I mention the Houston Area Urban
24	A. Written out. They are still in	24	League?
25	discussion.	25	Q. No.
	discussion.	23	Q. 110.
	Page 96		Page 97
1	A. Houston Area Urban League.	1	equitable access is in the context of voting?
2	Q. Are all these groups that you just	2	A. Ensuring that the demographic of voters
3	identified part of the discussions about forming an	3	that exist in Harris County and the livelihoods that
4	elections advisory council?	4	they have, that we have election systems that make it
5	A. No.	5	easy for them to access voting either vote by mail,
6	Q. Which ones of the ones that you just	6	voting in person, voting early, voting on election
7	listed are involved?	7	
			day.
8	A. That I recall, the Houston Urban Area	8	Q. What kind of voters need those options
8 9	A. That I recall, the Houston Urban Area League.	8	
9 10	League. Q. Any others?	8	Q. What kind of voters need those options
9 10 11	League.	8 9 10 11	Q. What kind of voters need those options from Mi Familia Vota's perspective?
9 10 11 12	League. Q. Any others?	8 9 10 11 12	Q. What kind of voters need those options from Mi Familia Vota's perspective? A. We have several community members that
9 10 11 12 13	League. Q. Any others? A. I believe Move Texas is also part of those conversations. Q. Any other groups?	8 9 10 11	Q. What kind of voters need those options from Mi Familia Vota's perspective? A. We have several community members that work nontraditional work hours. So, for example, 7:00 a.m. to 7:00 p.m. voting hours might not necessarily fit their work schedule.
9 10 11 12	League. Q. Any others? A. I believe Move Texas is also part of those conversations.	8 9 10 11 12	Q. What kind of voters need those options from Mi Familia Vota's perspective? A. We have several community members that work nontraditional work hours. So, for example, 7:00 a.m. to 7:00 p.m. voting hours might not
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9 10 11 12 13 14	League. Q. Any others? A. I believe Move Texas is also part of those conversations. Q. Any other groups? A. Not that I can recall at the moment.	8 9 10 11 12 13 14	Q. What kind of voters need those options from Mi Familia Vota's perspective? A. We have several community members that work nontraditional work hours. So, for example, 7:00 a.m. to 7:00 p.m. voting hours might not necessarily fit their work schedule. Q. Can you give me an example of the kind
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9 10 11 12 13 14 15 16 17	League. Q. Any others? A. I believe Move Texas is also part of those conversations. Q. Any other groups? A. Not that I can recall at the moment. Q. How often does the group meet on the elections advisory council?	8 9 10 11 12 13 14 15	Q. What kind of voters need those options from Mi Familia Vota's perspective? A. We have several community members that work nontraditional work hours. So, for example, 7:00 a.m. to 7:00 p.m. voting hours might not necessarily fit their work schedule. Q. Can you give me an example of the kind of worker you're talking about? A. Yes. For example, truck drivers that
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	Page 274		Page 275
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1	subpoenaing specific legislators.	1	A. Yeah, well, we hear from community
2	Q. Has Mi Familia Vota retained any	2	members, particularly in Harris County, is that you
3	experts to speak to intentional discrimination?	3	see methods like drive-thru voting, 24-hour voting,
4	A. I believe so.	4	those were methods that had they had never used
5	Q. Any other efforts that you're aware of	5	before that were implemented in the 2020 election,
6	that Mi Familia Vota is making to discover	6	and community members liked using that. It was
7	intentional discrimination?	7	convenient for them to use it. It was time
8	A. I believe there are efforts to that	8	convenient it was also less time consuming than
9	rely on experts to have information around the	9	other regular voting practices and it was accessible,
10	disproportionate impact and voting that S.B.1	10	and so I we think that that contributed to an
11	would have on the community.	11	increase in voter turnout from our Latino community.
12	Q. So just clearing up a bit about your	12	Q. Are those processes that you've
13	specific community, because there were questions	13	identified as contributing potentially to the record
14	about your community versus others.	14	voter turnout in 2020 addressed by S.B. 1?
15	Are you aware of what the Latino voter	15	A. S.B. 1 limits or prohibits several of
16	turnout was in the 2020 general election?	16	those different voting methods that were implemented
17	A. It was higher than previous elections.	17	in 2020.
18	Q. Was it a record election?	18	Q. And do you believe that's going to have
19	A. Yes.	19	an impact on the Latino vote in the future?
20	Q. Record turnout?	20	A. Yes.
21	A. Yes, substantially higher, particularly	21	MR. HUDSON: Objection: Form; calls
22	during early voting.	22	for speculation.
23	Q. Are there provisions in S.B. 1 are	23	MR. PROWANT: I don't have any other
24	you aware of why there was a record voter turnout for	24	questions.
25	Latino voters?	25	MR. HUDSON: Yeah, I have just got a
	Page 276		Page 277
1	-	1	-
1 2	couple of follow-ups.	1 2	sign.
2	couple of follow-ups. FURTHER EXAMINATION	2	sign. THE VIDEOGRAPHER: Off the record.
	couple of follow-ups. FURTHER EXAMINATION Q. (BY MR. HUDSON) Okay. You had	2	sign. THE VIDEOGRAPHER: Off the record. The time is 7:05.
2 3 4	couple of follow-ups. FURTHER EXAMINATION Q. (BY MR. HUDSON) Okay. You had indicated that your attorney team is conducting	2 3 4	sign. THE VIDEOGRAPHER: Off the record.
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